William K. Hubbard Dockets Management Branch (HF-A305) Food and Drug Administration 5630 Fishers Lane, Rm. 1061 Rockville, MD 20852

Re: Federal Register Request for Information: Performance Standard for Vibrio vulnificus Docket Number 98P-0504-Volume 64, Number 13, Page 3300-3301

Dear Mr. Hubbard,

This letter is in response to the FDA's request for information on eight points of interest regarding issues raised by a petition submitted by Center for Science in the public interest.

In 1998 shellfish farmers along with the ISSC and FDA developed an interim control plan for V. parahaemolyticus that set stricter control measures for the industry than what it currently required.

I have talked recently with officials from the Washington State Department of Health Shellfish Division and they feel that this plan has worked well. West coast illness associated with V. paarahaemolyticus virtually ceased when the industry voluntarily halted sales for raw consumption as called for by this plan.

I urge the FDA to refer this matter over to the ISSC for continued deliberation and at the same time provide the funding and research necessary to develop appropriate criteria for drafting public health policy. Sincerely,

lΛ /J.

John Herrold

Herrold Fish & Oyster Co. Inc.

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John Herrold 4109 State Hwy. 101 Ilwaco, WA 98624





William K. Hubbard

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